

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of ORLY  
GENGER to Remove Dalia Genger as Trustee of  
the Orly Genger 1993 Trust Established on  
Dec.13, 1993 by Arie Genger, grantor.

SDNY Case No. 19-cv-9319 (AKH)

Orly Genger, beneficiary of The Orly Genger  
1993 Trust,

N.Y. Cty. Surrogate's Court File  
No.: 2008-0017

Petitioner,

- against -

Dalia Genger, as trustee of The Orly Genger  
1993 Trust, and The Sagi Genger 1993 Trust,

Respondents.

**STATEMENT UPON REMOVAL**

Pursuant to Rule 9027(e)(3), The Orly Genger 1993 Trust does not consent to  
entry of final orders or judgment by a United States Bankruptcy Judge.

The Orly Genger 1993 Trust will file a motion to remand this matter to  
Surrogate's Court and will oppose the motion to transfer to the Western District of Texas (dkt.  
#3).

Dated: October 21, 2019  
New York, NY

Respectfully submitted,

POLLOCK COHEN LLP

By: /s/ Adam Pollock  
Adam Pollock  
60 Broad St., 24th Fl.  
New York, NY 10004  
(212) 337-5361  
Adam@PollockCohen.com  
*Attorneys for The Orly Genger 1993 Trust*

To (via USPS First Class Mail):

Andrew R. Kurland, Esq.  
Michael Paul Bowen, Esq.  
Kasowitz Benson Torres LLP  
1633 Broadway  
New York, NY 10019  
*Counsel to the Bankruptcy Trustee*

John Dellaportas, Esq.  
Emmet Marvin & Martin LLP  
120 Broadway, 32nd Floor  
New York, NY 10271  
*Counsel to Sagi Genger 1993 Trust & Sagi Genger*

Steven Riker, Esq.  
Law Office of Steven Riker  
One Grand Central Place, 46th Floor  
New York, NY 10165  
*Guardian Ad Litem*

Judith Bachman, Esq.  
The Bachman Law Firm PLLC  
365 S. Main Street, 2nd Floor  
New City, NY 10956  
*Attorneys for Dalia Genger*